

*de maximis, inc.*

186 Center Street, Suite 290  
Clinton, NJ 08809  
(908) 735-9315

## LETTER OF TRANSMITTAL

To: USEPA Date 4/22/04 Project No. 3114E  
2890 Woodbridge Ave., Bldg. 209, Mailstop 211 Attention Joe Cosentino  
Edison, NJ 08837 RE: Bayonne Barrel & Drum

WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via \_\_\_\_\_ the following items:

- ☐ Shop drawings ☐ Prints ☐ Plans ☐ Samples ☐ Specifications  
☐ Copy of letter ☐ Change order ☒ Other - Description Below

COPIES	DESCRIPTION
1	B&B Trucking Waste Haulers Permit
1	A&L Salvage LLC Compliance Letter
1	A&L Salvage Application & Permit to Ohio EPA

### THESE ARE TRANSMITTED AS CHECKED BELOW:

- ☒ For approval ☐ Approved as submitted ☐ Resubmitted with corrections made  
☐ For your use ☐ Approved as noted ☐ Submit \_\_\_\_\_ copies for distribution  
☐ For your files ☐ Returned for corrections ☐ Return corrected prints  
☐ For review and comment ☐ As requested ☐ \_\_\_\_\_

REMARKS:

COPY TO: Jack McBurney, *de maximis, inc.*

SIGNED







400 Middlesex Avenue  
Carteret, NJ 07008  
(732) 969-2700 Fax (732) 969-2701

## LETTER OF TRANSMITTAL

DATE April 21, 2004	JOB NO. 628188
ATTENTION Kelly Fifer	
RE: Bayonne Barrel & Drum	

"Complete Solutions To Your Environmental Concerns"

de maximis, inc.

186 Center Street, Suite 290

Clinton, New Jersey

(908) 735-0315

WE ARE SENDING YOU ☒ Attached ☐ Under separate cover via \_\_\_\_\_ the following items:

- |   |                                       |                                |                                  |   |
|---|---------------------------------------|--------------------------------|----------------------------------|---|
| <input type="checkbox"/> Shop drawings  | <input type="checkbox"/> Prints       | <input type="checkbox"/> Plans | <input type="checkbox"/> Samples | <input type="checkbox"/> Specifications |
| <input type="checkbox"/> Copy of Letter | <input type="checkbox"/> Change Order | <input type="checkbox"/>       |                                  |   |

COPIES	DATE	NO.	DESCRIPTION
1	4/21/04		Fax Copy of B&B Trucking Waste Haulers Permit
1	4/21/04		Fax Copy of A&L Salvage LLC Compliance Letter
1	4/21/04		Fax Copy of A&L Salvage LLC Permit & Application to Ohio EPA

THESE ARE TRANSMITTED as checked below:

- |  |   |   |
|--|---|---|
| <input checked="" type="checkbox"/> For approval     | <input type="checkbox"/> Approved as submitted            | <input type="checkbox"/> Resubmit _____ copies for approval   |
| <input type="checkbox"/> For your use                | <input type="checkbox"/> Approved as noted                | <input type="checkbox"/> Submit _____ copies for distribution |
| <input type="checkbox"/> As requested                | <input type="checkbox"/> Returned for corrections         | <input type="checkbox"/> Return _____ corrected prints        |
| <input type="checkbox"/> For review and comment      | <input type="checkbox"/>                                  |   |
| <input type="checkbox"/> FOR BIDS DUE _____ 20 _____ | <input type="checkbox"/> PRINTS RETURNED AFTER LOAN TO US |   |

REMARKS:

COPY TO

File

Signed:

Thomas M. Tomassetti

## Transporter Permit Information

Apr-21-04 10:39A BILL FRANK TRUCKING  
02/21/2004 00:41 FAX 0152400001 BB TRUCKING

412 667 0609

P.02

0001

*A Certified Mail*  
*\* 70020960 0000 4502*  
*6738*



# State of New Jersey

Department of Environmental Protection

James E. McGreevey  
 Governor

Bradley M. Campbell  
 Commissioner

Mr. Arthur R. Bauer  
 B & B Trucking  
 1205 Doe Run Road  
 Shippenville, Pennsylvania 16254

**REC 10 2002**

RE: Solid Waste Transporter License

Dear Mr. Bauer:

N.J.S.A. 13: 1E-126 et seq.

This is to advise you that the investigative report from the Attorney General required under N.J.S.A. 13:1E-126 et seq. has been received by the Department of Environmental Protection.

Based on our review of the aforementioned investigative report, the Department is hereby issuing a Solid Waste Transporter License to:

**ARTHUR R. BAUER T/A B & B TRUCKING**

This letter will serve as documentation that a solid waste transporter license has been issued. This license must be renewed annually by filing the Annual License Update form and any other change of information concerning your company or its operation as required by the Department.

You may also be required to obtain a Certificate of Public Convenience and Necessity prior to commencing solid waste business operations. Questions regarding this certificate should be directed to the Bureau of Solid Waste Regulation at (609) 984-2080. Any transportation equipment must be registered prior to commencing operations. Questions regarding equipment registration of the above license should be directed to the Bureau of Hazardous Waste Regulation at (609) 292-7081.

Sincerely,

*Norine Binder*  
 Norine Binder, Chief  
 Bureau of Hazardous Waste Regulation

LC: 02/B&B-S:lc  
 c: Harley Williams  
 Mike DeTalvo

New Jersey is an Equal Opportunity Employer  
 Recycled Paper

*OPT. 13*  
*PAULA*

*609-292-7081*

*EXT 1-1*

*DECAL'S*

*PAULA*  
*PAULA*  
*PAULA*

## Disposal Facility Compliance Letter



A & L SALVAGE LLC.  
PO BOX 333  
LISBON OH 44432  
330-424-3739 PHONE  
330-424-5318 FAX

To: Code Environmental Services

Re: Bayonne Barrel & Drum Project

Per your request for the indicated project A & L Salvage's permit & operations in compliance with applicable Federal & State regulations as verified by weekly health department inspections.

Sincerely,

Gary McLaren  
General Manager

## Facility Permit Information

# OhioEPA

2004

# CONSTRUCTION AND DEMOLITION DEBRIS FACILITY LICENSE

**EXPIRES DECEMBER 31, 2004**

**HEALTH DISTRICT**  
**Columbiana County.**

**CITY/TOWNSHIP** Lisbon / Center & Elkrun

This license has been issued in accordance with the requirements of state law and is subject to revocation or suspension for cause and is not transferable without consent of the Board of Health and the Director of the Ohio Environmental Protection Agency.

CONDITIONS OF LICENSE ON REVERSE SIDE

(Yes, additional special terms and conditions are applicable to this license. (see attachment))

December 23, 2003

Date Issued \_\_\_\_\_

## Health Compliances

**EPÄ 0730**





Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

State of Ohio Environmental Protection Agency

RE: **FINAL PERMIT TO INSTALL**  
**COLUMBIANA COUNTY**  
Application No: 02-18003

**CERTIFIED MAIL**

DATE: 9/9/2003

A and L Salvage Inc  
Stephen Callahan  
P.O. Box 333  
Lisbon, OH 44432

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

NEBO



## STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions****Issue Date: 9/9/2003  
Effective Date: 9/9/2003****FINAL PERMIT TO INSTALL 02-18003**

Application Number: 02-18003

APS Premise Number: 0215060342

Permit Fee: \$100

Name of Facility: A and L Salvage Inc

Person to Contact: Stephen Callahan

Address: P.O. Box 333  
Lisbon, OH 44432Location of proposed air contaminant source(s) [emissions unit(s)]:  
**11225 State Route 45  
Lisbon, Ohio**Description of proposed emissions unit(s):  
**Modification to remove the operational restriction regarding asbestos disposal.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Director

exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Landfill operations at a construction and demolition landfill: waste unloading and wind erosion.	OAC rule 3745-31-05 (A)(3)	Visible emissions not to exceed 10 percent opacity as a six-minute average.
		Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust
	OAC rule 3745-17-08 (B)	Particulate emissions shall not exceed 3.49 tons per year.
		The emission limitation specified by this rule is less stringent than the

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A and L Salvage Inc  
FTI Application: 02-18003  
Issued: 9/9/2003

Facility ID: 0215060342

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. ~~These reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)~~

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The

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permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

#### 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

#### 6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

#### 7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

#### 8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### 9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency.

There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance

CITY OF CLEVELAND, OHIO

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that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### 10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### 11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### 12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### 13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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**A and L Salvage Inc**

**PTI Application: 02-18003**

**Issued: 9/9/2003**

Facility ID: 0215060342

#### 14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

## 15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

### B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)**  
**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	3.49

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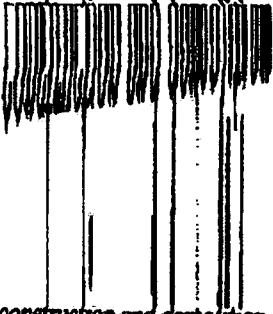

A and L Salvage Inc  
 PTI Application: 02-18003  
 Issued: 9/9/2003

Facility ID: 0215060342  
 Emissions Unit ID: F002

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
F002 - Landfill operations at a  construction and demolition landfill: waste unloading and wind erosion.	OAC rule 3745-31-05 (A)(3)	Visible emissions not to exceed 10  percent opacity as a six-minute average.  Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust  Particulate emissions shall not exceed 3.49 tons per year.  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).  The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
Asbestos-containing material activities	OAC rule 3745-17-08 (B)  OAC rule 3745-17-07(B)(1)  OAC rule 3745-31-05(A)(3)	

NOT FOR PRODUCTION OF WASTE A&L SALVAGE INC 18003 P. 011

NOT FOR PRODUCTION OF WASTE A&L SALVAGE INC 18003 P. 011

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40 CFR 61.149 through 61.151,  
61.153 and 61.154

The requirements specified by this rule is equivalent to those established pursuant to OAC rule 3745-31-05 (A)(3).

OAC rule 3745-20-05 through  
3745-20-08

The requirements specified by this rule is equivalent to those established pursuant to OAC rule 3745-31-05 (A)(3).

## 2. Additional Terms and Conditions

- 2.a The landfill areas that are covered by this permit and subject to the requirements of OAC 3745-31-05 are listed below:

Entire landfill area.

- 2.b The permittee shall employ best available control measures on all landfill operations associated with the load-in of C&DD for the purposes of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to dispose of material with an inherently high moisture content to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c The above-mentioned control measures shall be employed for each C&DD landfill cell if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during any such operation until further observation confirms that use of the measures is unnecessary.

- 2.d The permittee shall employ best available control measures for wind erosion from the surface of the landfill for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to lowering drop heights during periods of high wind speed to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.e The above-mentioned control measures shall be employed for wind erosion from the landfill if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure

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compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for the landfill cell that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

- 2.f Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

## B. Operational Restrictions

1. There shall be no open burning, in violation of OAC Chapter 3745-19, at this facility.
2. In accordance with the conditions of this permit, the permittee is authorized to accept and dispose of asbestos-containing waste materials subject to the provisions of NESHAP, 40 CFR Part 61, Subparts A and M and the regulations adopted by the Ohio EPA in Chapter 3745-20 of the Ohio Administrative Code. Waste materials exempted from these regulations are subject to regulation as C&DD.
3. The permittee shall inspect each load of asbestos containing material delivered. The inspection shall consist of visual examination of each load, sufficient to determine whether the friable asbestos-containing materials are received in intact, leak-tight containers labeled with appropriate hazard warning labels, name of the waste generator and location and shall determine whether the waste shipment records (WSR) required by Section C.8., accompany the consignment and accurately describe the waste material and quantity.
4. If on the basis of the inspection, the waste material is found improperly received, the load shall be disposed of in accordance with the procedures in the "Asbestos Spill Contingency Plan" described in Section B.8., and the discrepancy notation shall be made on the waste shipment record.
5. Deposition and burial operations shall be conducted in a careful manner that prevents handling by equipment or persons that causes asbestos-containing waste materials to be broken up or dispersed before the materials are buried.
6. Unless a natural barrier adequately deters access by the general public, either warning signs and fencing must be installed and maintained as follows, or it must be covered with at least 15 centimeters (6 inches) of compacted non-asbestos-containing material, or other equally effective dust suppression agents may be used upon prior approval by the Administrator. Warning signs must be displayed at all entrances and at intervals of 100 meters (330 feet) or less along the property line of the site or along the perimeter of the sections of the site where asbestos-containing waste material was deposited. The warning signs must:

USER VERIFIED: JERRY WASTVARE, SALVAGE INC (1803P.WPD)

JERRY WASTVARE, SALVAGE INC (1803P.WPD)

A and L Salvage Inc

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- a. Be posted in such a manner and location that a person can easily read the legend; and,
- b. Conform to the requirements for a 51 cm X 36 cm (20" X 14") upright format warning sign specified in 29 CFR 1910.145(d)(4) and this paragraph; and,
- c. Display the following legend in the lower panel with letter sizes and styles of a visibility at least equal to those specified in this paragraph.

**ASBESTOS WASTE DISPOSAL SITE  
DO NOT CREATE DUST  
BREATHING ASBESTOS IS HAZARDOUS TO YOUR HEALTH**

Notation: The lettering shall be 2.5 cm (1 inch) Sans Serif, Gothic or Block, 1.9 cm (3/4 inch) Sans Serif, Gothic or Block or 14 Point Gothic. Spacing between any two lines must be at least equal to the height of the upper of the two lines.

7. The permittee shall cover asbestos wastes in accordance with the following:
  - a. As soon as practicable after the placement of friable asbestos, but no later than the end of each working day and before compacting, the asbestos-containing waste material deposited at the site during the operating day shall be covered with at least twelve inches of non-asbestos containing material.
  - b. Care shall be taken to ensure disposed asbestos shall not be re-excavated in subsequent operations. Any accidentally exposed material shall be immediately recovered in accordance with the provisions of condition B.7.a. unless the material has been substantially compromised, in which case this facility will implement the appropriate provisions of the "Spill Contingency Plan" as required by condition B.8.
  - c. Asbestos-containing waste materials shall be separated from the landfill final grade by no less than 24 inches of compacted non-asbestos-containing material and a permanent cover of vegetation, or in accordance with current requirements for closure, whichever is most stringent.
8. The permittee shall implement and maintain an "Asbestos Disposal Operating Procedure and Spill Contingency Plan" (Plan) consisting of authorized personnel training, inspection and disposal operating procedures, non-conforming load response procedures, inventory and maintenance procedures for safety and emission control equipment, record keeping procedures and emergency notification procedures. The permittee shall be knowledgeable in the procedures and the Plan shall be available for inspection at this facility at all times.
9. The permittee shall have emission control equipment available for wetting and containing asbestos in the event of a release or non-conforming load disposal. All equipment required to

SERVER PROTECT LIBERTY WASTE A&L SALVAGE 0218003.F002

0218003.F002

- b. As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator.
  - c. Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity actually received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the state, local, district, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the Ohio EPA, Northeast District Office. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report.
9. Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area.

USE ONLY PROJECTS UNDER THE WASTE MANAGEMENT ACT, 1970  
DO NOT REPRODUCE OR TRANSMIT IN ANY MANNER

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Emissions Unit ID: F002

implement the Plan shall be maintained in accordance with good engineering practices to ensure equipment is in a ready to use condition, and in an appropriate location for use.

10. Upon closure, comply with all the provisions of rule 3745-20-07.
11. Leachate shall not be used for dust control.

C.

1. Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each C&DD landfill cell in accordance with the following frequencies:

Landfill Cell Identification

Active cell(s)  
Asbestos activity

Daily  
Daily

2. Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from C&DD landfill cell surfaces in accordance with the following frequencies:

Landfill Cell Identification

Active cell(s)  
Asbestos activity

Daily  
Daily

3. No inspection shall be necessary for wind erosion from the surface of a C&DD landfill cell when the cell is covered with snow and/or ice and for any landfill cell activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-mentioned events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
4. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in of a C&DD landfill cell, and wind erosion from the surface of a C&DD landfill cell. The inspections shall be performed during representative, normal landfill operating conditions.
5. The permittee may, upon receipt of written approval from the Northeast District Office of the Ohio EPA, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
6. The permittee shall maintain records of the following information:

USE ONLY PROJECTS UNDER THE WASTE MANAGEMENT ACT, 1970  
DO NOT REPRODUCE OR TRANSMIT IN ANY MANNER

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1. The date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
  2. The date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  3. The dates the control measures were implemented; and
  4. On a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from landfill surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).
- The information required in 6.d shall be kept separately for (i) the load-in operation, and (ii) the landfill surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.
7. The permittee shall annually record the amount of C&DD waste deposited in the landfill.
  8. The permittee shall require that all waste shipments received from NESHAP regulated facilities as defined in 40 CFR 61.141, be accompanied by a Waste Shipment Record as described in 40 CFR 61.150(d)(1).
    - a. The waste shipment record forms shall be retained at the facility for at least two years, and will be made available for inspection upon request.
    - b. As soon as possible and no longer than 30 days after receipt of the waste, send a copy of the signed waste shipment record to the waste generator.
    - c. Upon discovering a discrepancy between the quantity of waste designated on the waste shipment records and the quantity actually received, attempt to reconcile the discrepancy with the waste generator. If the discrepancy is not resolved within 15 days after receiving the waste, immediately report in writing to the state, local, district, or EPA Regional office responsible for administering the asbestos NESHAP program for the waste generator (identified in the waste shipment record), and, if different, the Ohio EPA, Northeast District Office. Describe the discrepancy and attempts to reconcile it, and submit a copy of the waste shipment record along with the report.
  9. Maintain, until closure, records of the location, depth and area, and quantity in cubic meters (cubic yards) of asbestos-containing waste material within the disposal site on a map or diagram of the disposal area.

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WASTE PERMITTING DIVISION COLUMBUS OHIO 43260-0000

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**D. Reporting Requirements**

1. The permittee shall submit deviation reports that identify any of the following occurrences:
  1. Each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation;
  2. Each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented; and,
  - c. Each instance when a leachate sample collected from cells that store asbestos used to control fugitive dust contained detectable quantities of asbestos..
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. The permittee shall prepare and submit to Ohio EPA, Northeast District Office, quarterly reports summarizing asbestos disposal activities. This report must contain the following information:
  - a. The name, address and location of this facility; the calendar period covered by the report; and changes in methods of storage or disposal operations.
  - b. A list of all asbestos-containing waste consignments received including: the date received, the name of the waste generator, the name and location of the facility where the load originated, the quantity of asbestos, and any discrepancy or non-conformity discovered.
  - c. These reports shall be submitted no later than January 15, April 15, July 15 and October 15 and shall cover the previous calendar quarter.
4. Submit to Ohio EPA, Northeast District Office, upon closure of the facility, a copy of records of asbestos waste disposal locations and quantities.
5. Notify Ohio EPA, Northeast District Office in writing at least 45 days prior to excavating or otherwise disturbing any asbestos-containing waste material that has been deposited at a waste disposal site and is covered. If the excavation will begin on a date other than the one contained in the original notice, notice of the new start date must be provided at least 10 working days

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before excavation begins and in no event shall excavation begin earlier than the date specified in the original notification. Include the following information in the notice:

- a. Scheduled starting and completion dates.
  - b. Reason for disturbing the waste.
  - c. Procedures to be used to control emissions during the excavation, storage, transport, and ultimate disposal of the excavated asbestos-containing waste material. If deemed necessary, the Director may require changes in the emission control procedures to be used.
  - d. Location of any temporary storage site and the final disposal site.
6. The permittee shall notify the Ohio EPA, Northeast District Office of any load of asbestos-containing material which is rejected, or any non-conforming load in accordance with the Asbestos Spill Contingency Plan. Notification shall be provided as soon as possible by a phone contact, followed in writing by the next working day providing a copy of the waste shipment record if available, or when waste is not shipped with a WSR, provide available information on vehicle identification, source of the load, a description of the load, nature of discrepancy, and the location of disposal. If possible, non-conforming loads of suspect friable material shall be detained or the location of disposal protected from damage until the Ohio EPA, Northeast District Office is informed and provided the opportunity to inspect.

#### E. Testing Requirements

1. Compliance with the visible emission limitations from the landfill surfaces identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources").
2. Emission Limitation: 3.49 tons of particulate emissions per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the following equation:

Landfill Operations: From AP-42, Section 13.2.4, "Aggregate Handling and Storage Pile", version 1/95.

$$EO = k \times 0.0032 \times (U/5)^{1.3} / (M/2)^{1.4} \times WA \times 365/2000$$

where

EO = particulate emission, tons per year

k = constant, 0.74

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REASON: "LIBERTY WASTE AND SALVAGE" NOT RECORDED

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U = mean wind speed, 7 miles per hour  
 M = material moisture content, 12%  
 WA = waste acceptance, tons per year  
 365 = conversion factor, days per year  
 2000 = conversion factor, pounds per ton

Wind Erosion: From Air Pollution Engineering Manual, Chapter 4, "Fugitive Emissions", Wind Erosion, p. 136.

$$EW = 1.7 \times (s/1.5) \times [(365-p)/235] \times (f/15) \times A \times (1-0.8)/2000$$

where

EW = particulate emissions, tons per year  
 s = silt content, 6.4%  
 p = number of days with greater than 0.01 inches of precipitation per year, 150  
 f = percent of time that wind speed exceeds 12 miles per hour, 30%  
 A = area of landfill susceptible to wind erosion, 6.9 acres for disposal  
 0.8 = 80% control efficiency for good operating practices  
 2000 = conversion factor, pounds per ton

Total particulate emissions:

$$E = EO + EW$$

where

E = total particulate emissions, tons per year  
 EO = particulate emissions from landfill operations, tons per year  
 EW = particulate emissions from wind erosion, tons per year

### 3. Emission Limitation

No visible emissions from asbestos-containing materials during on-site transportation, transfer, unloading, deposition or compacting operations.

#### Applicable Compliance Method

Compliance shall be determined through the monitoring and record keeping requirements of Section C. If required, compliance shall also be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications

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listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03. Alternate, equivalent methods may be used upon approval by Ohio EPA, Northeast District Office.

**4. Emission Limitation**

No detectable asbestos in the leachate collected from cells that store asbestos used to control fugitive dust.

**Applicable Compliance Method**

Compliance shall be determined by demonstrating that the leachate contains no detectable asbestos in accordance with Test Methods in EPA-600/4-83-043. Alternate, equivalent methods may be used upon approval by Ohio EPA, Northeast District Office.

- 5. Asbestos activities in this permit shall be considered to be those activities involving material defined as "asbestos-containing waste material" in OAC rule 3745-20-01 or "asbestos-containing waste" in 40 CFR 61.141 containing more than 1 percent asbestos as determined using the methods specified in Appendix A, Subpart F, 40 CFR Part 763 Section 1, Polarized Light Microscopy.**

**F. Miscellaneous Requirements**

- 1. Pursuant to the authority in OAC 3745-77-07 (C)(2) or ORC Section 3704.03 (L), any representative of the Director may, upon presentation of proper identification, enter at any reasonable time upon any portion of the property where this landfill is located, including any improvements thereon, to make inspections, take samples, conduct tests and examine records or reports pertaining to any emissions of air contaminants and any monitoring equipment, emissions control equipment or methods. No operator or agent of this landfill shall act in any manner to refuse, hinder, or thwart this legal right of entry.**
- 2. The terms and conditions of this PTI replaces the terms and conditions for this emissions unit as written in PTI number 02-13949, issued June 21, 2000.**

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PTI Number: 02-18003

Facility ID: 0215060342

FACILITY NAME A and L Salvage IncFACILITY DESCRIPTION Modification to remove the operational restriction regarding asbestos disposal. CITY/TWP LisbonSIC CODE 4953

SCC CODE \_\_\_\_\_

EMISSIONS UNIT ID F002EMISSIONS UNIT DESCRIPTION Landfill operations at a construction and demolition landfill: waste unloading and wind erosion.

DATE INSTALLED \_\_\_\_\_

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

attainment	na	3.49	na	3.49

## APPLICABLE FEDERAL RULES:

NSPS?

NESHAP? 40 CFR Part 61, Subpart M

PSD?

OFFSET POLICY?

Enter Determination Like sources, best engineering judgement, NESHAP established requirements.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NoOPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value

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CITY/TWP Lisbon

AIR TOXICS MODELING PERFORMED\*? YES XX NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

REPLACES PREVIOUS EDITIONS OF THIS FORM. SEE INSTRUCTIONS FOR USE.